AVIATION RULEMAKING ADVISORY COMMITTEE ON TRAINING AND QUALIFICATIONS ISSUES

Meeting Minutes

DATE: June 1, 1995

PLACE: FAA Headquarters, Office of Rulemaking, Room 302, 800 Independence Avenue, S.W., Washington, DC. (noon)

PUBLIC NOTIFICATION: An announcement of this meeting was published in the Federal Register on May 19, 1995 [60 FR 26916].

MEETING SUMMARY

The meeting of the Aviation Rulemaking Advisory Committee (ARAC) on Training and Qualifications began at noon. Mr. Walt Coleman, the Assistant ARAC Chair for Training and Qualifications, opened the meeting by referring participants to the progress report submitted by the Aircraft Dispatchers Working Group that he had distributed on behalf of the Working Group Chair, unable to attend the meeting. (see Attachment A) Mr. Coleman mentioned that the group was progressing along on its task to revise Part 65, Subpart C, and would perhaps request to give a presentation at the next meeting planned for September 6, 1995.

Progressing to the next agenda item, a discussion of English Language requirements for flight attendants, Mr. Coleman summarized previous ARAC activity on this matter. He explained that, on April 18, 1994, per ARAC recommendation, the Federal Aviation Administration (FAA) published an Advance Notice of Proposed Rulemaking (ANPRM) entitled "Operator Flight Attendant English Language Program." This issue was further discussed at the December 7, 1994, ARAC meeting when the FAA presented a task seeking recommendations on how to bring the ANPRM to closure. It was decided, at that meeting, that not enough data was received in response to the ANPRM to warrant further FAA action. In response to a request from the Association of Flight Attendants (AFA), however, ARAC agreed to allow AFA more time to collect further data from their constituents before responding to the FAA task.

Mr. Coleman then deferred to Ms. Ann Tonjes of the AFA to present their findings.

Ms. Tonjes distributed a handout containing their further findings and invited the meeting participants to take a few minutes and review the material. (see Attachment B) A discussion then ensued. Subsequent to this general discussion, Ms. Tonjes, along with Ms. Meg Leith of the AFA and Ms. Debbie Roland of the Association of Professional Flight Attendants (APFA) made the following comments:

- The quality of training is the issue. If we have a rule, then we'll be empowered to get better training for our flight attendants. The proficiency test is the key issue to the problem.
- Diction has been one of the main problems. People are able to pass a written test but still have communication problems due to diction.
- If we don't surface the issue, problems will continue with no current mechanism in place to address the problem. There is no recourse.
- CRM will provide a method, but CRM may not work without a specific English language requirement for flight attendants.
- Safety is a consideration when passengers can't understand commands from flight attendants who are not English language proficient. Having a regulation would increase safety.

In a final remark on this issue, Mr. Bill Edmunds of the Airline Pilots Association asked the AFA and APFA members whether they had queried the Aviation Safety Reporting System to see whether there had been any reported incidents involving English language proficiency problems among flight attendants. Ms. Leith responded that they had done so and that no incidents had been found.

To conclude the discussion, Mr. Coleman indicated that the AFA and APFA members had used ARAC effectively to relay their concerns and that, based on their data, the problem should be re-examined. Mr. Coleman advised that the data should be added to the original comments received to the ANPRM. Mr. Toula said that he would go back and discuss the matter further, once again, within the FAA. Ms. Citrenbaum of the FAA reminded the meeting participants that, since the matter was officially tasked to ARAC at the December 7 meeting, the task will have to be officially accepted or rejected by ARAC at some point.

Mr. Coleman adjourned the meeting by announcing that the next meeting date would be held on September 6, 1995 at noon. The meeting will be held at the Regional Airline Association, 1200 19th Street NW, Washington, DC, Suite 300.

I certify that the above minutes are accurate.

Walt Coleman

Chair

MEETING ATTENDEES

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DISPATCH WORKING GROUP

ARAC REPORT - JUNE 01, 1995

THE DISPATCH WORKING GROUP IS NEARING COMPLETION OF ITS REGULATORY REVIEW OF FAR PART 65, SUBPART C AND APPENDIX A. SEVERAL MONTHS AGO WE COMPLETED OUR REWRITE PROCESS AND WE ARE NOW IN THE PROCESS OF REVIEWING AND EDITING OUR DRAFT DOCUMENT.

ATTACHED PLEASE FIND DRAFT 3.4. THIS IS OUR LATEST VERSION OF THE DOCUMENT. PLEASE FEEL FREE TO REPRODUCE AND DISTRIBUTE THIS DOCUMENT AS NECESSARY.

SPECIFICALLY AT THIS TIME THE WORKING GROUP IS NEARING THE COMPLETION OF OUR EDIT / REVIEW PROCESS. WHEN WE HAVE WORKING GROUP CONCURRENCE WE WILL WORK WITH THE CONTRACTOR AND SEVERAL GROUPS INSIDE THE AGENCY AS WE BEGIN TO PACKAGE OUR PRODUCT FOR THE ARAC COMMITTEE.

ONE CHANGE THE W/G HAS MADE WAS TO ADD A MINIMUM AGE TO TAKE THE WRITTEN TEST. TO BE ELIGIBLE TO TAKE THE WRITTEN THE APPLICANT MUST BE 21 YEARS OF AGE. PLEASE SEE 65.53 - ELIGIBILITY REQUIREMENTS. JUSTIFICATION - END CONFUSION OF APPLICANTS WHO TAKE WRITTEN WHEN THEY ARE NINETEEN. SINCE THE WRITTEN IS GOOD FOR 24 MONTHS THEY MUST RETAKE THE WRITTEN BEFORE A CERTIFICATE CAN BE ISSUED, DUE TO THE FACT THE MINIMUM AGE REQUIREMENT TO BE ELIGIBLE FOR A CERTIFICATE IS 23 YEARS OF AGE.

THE W/G IS REVIEWING THE SUBJECTS IN THE APPENDIX TO BE SURE THAT NO SIGNIFICANT ITEM HAS BEEN FORGOTTEN, AND ALSO THAT NO ITEMS HAVE DUPLICATE COVERAGE. OUR APPENDIX SUBJECTS ARE SOMEWHAT BROAD AS WE HOPE THIS WILL HELP THE DOCUMENT STAND THE TEST OF TIME. WE FELT THAT IF WE WERE TOO SPECIFIC OUR DRAFT WOULD BE QUICKLY OUT OF DATE. AT THE END OF THE CORE SUBJECTS IN THE APPENDIX WE HAVE INSTITUTED LANGUAGE THAT TIES THE DOCUMENT TO THE PRACTICAL TEST STANDARDS GUIDE (PTS). THE PTS IS PERIODICALLY UPDATED AND THIS WILL AID IN UP TO DATE TRAINING.

RECENTLY THE W/G SENT SURVEYS TO TWELVE DISPATCH TRAINING SCHOOLS. WE WANTED TO TAKE THE SCHOOL'S VIEWS INTO ACCOUNT TO AID THE W/G IN PREPARING THE BEST RECOMMENDATIONS POSSIBLE. SEVERAL OF THOSE SURVEYS HAVE BEEN RECEIVED BACK AND THEIR COMMENTS ADDRESSED. WE WILL CONTINUE TO TAKE THIS FEEDBACK INTO

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ARAC UPDATE- PAGE TWO.

ACCOUNT DURING THE COMING MEETINGS. MOST COMMENTS HAVE BEEN FAVORABLE. DURING THE SEPTEMBER TRAINING AND QUALIFICATION MEETING I WILL HAVE A COMPLETE LIST OF COMMENTS AND THEIR DISPOSITION AVAILABLE.

SINCERELY,

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TIM ANTOLOVIC

WORKING GROUP CHAIRMAN

Dispatch Working Group

FAR 65 Subpart Cand Appendix A

Draft 3.4

Draft Working Material Not For Public Release

SUBPART C 5.4

AIRCRAFT DISPATCHERS

65.51 CERTIFICATE REQUIRED.

- (a) No person may serve as an aircraft dispatcher (exercise responsibility with the pilot in command in the operational control of a flight) in connection with any civil aircraft in air commerce unless he/she has in his/her personal possession a current aircraft dispatcher certificate issued under this subpart.
- (b) Each person who holds an aircraft dispatcher certificate shall present it for inspection upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or Local enforcement officer.

65.53 ELIGIBILITY REQUIREMENTS: GENERAL

To be eligible to take the dispatch written test, a person must be at least 21 years of age. To be eligible for an aircraft dispatcher certificate, a person must

- (a) Be at least 23 years of age;
- (b) Be able to read and communicate using the English language in oral and written forms;
- (c) Comply with Subpart 65.55, 65.57, 65.59.

65.55 KNOWLEDGE REQUIREMENTS.

- (a) An applicant for an aircraft dispatcher certificate must pass a knowledge test on items outlined in Appendix A of this subpart as follows:
 - (1) Regulations
 - (2) Meteorology
 - (3) Navigation
 - (4) Aircraft
 - (5) Communications
 - (6) Air Traffic Control
 - (7) Emergency and Abnormal Procedures
 - (8) Practical Dispatch Applications
- (b) A report of the test is provided to the applicant. A passing grade is evidence, for a period of 24 months after the date the test is given, that the applicant has complied with this section.

65.57 EXPERIENCE REQUIREMENTS.

An applicant for an aircraft dispatcher certificate must present documentary evidence satisfactory to the Administrator that he/she has the experience prescribed in any one of the following paragraphs:

- (1) A total of at least 2 of the last 3 years before the date he or she applies $\,\,$ -
 - (a) In military operations as a
 - i. Pilot, Flight Navigator,
 - ii. Meteorologist.
 - (b) In FAR 121 air carrier operations as -
 - Assistant in dispatching air carrier aircraft, under the direct supervision of a dispatcher certified under this subpart;
 - if. Air carrier pilot;
 - ili. Flight Engineer,
 - iv. Meteorologist.

eri. Flight Service Specialist

- (d) Performing other duties that the Administrator's aircraft dispatcher certificate representative finds provide equivalent experience.
- (2) An applicant is entitled to credit and combine experience in paragraph (1a) through (1d) of this section, if the aggregate of that experience is at least 2 of the last 3 years before the date of application.
- (3) Within 90 days before the date he/she applies, successful completion of a course of instruction approved by the Administrator as adequate for the training of an arcuait dispatcher.

65.59 SKILL REQUIREMENTS.

An applicant for an aircraft dispatcher certificate must pass a test given by the Administration's aircraft dispatcher certificate representative based on the Aircraft Dispatcher Fractical Test Standards as published by the FAA on items outlined in Appendix A of this subpart.

65.61 AIRCRAFT DISPATCHER CERTIFICATION COURSES.

An applicant for approval of an aircraft dispatcher course shall submit a letter to the Administrator requesting approval, and shall also submit two copies of the course outline, a description of equipment and facilities to be used and a list of the instructors and their qualifications. Requirements for the course and the outline are set forth in Appendix A of this part.

Overview

The aircraft dispatcher and the pilot in command are jointly responsible for the authorization and control of a flight in accordance with Government and Air Carrier regulations and procedures. This responsibility extends from the preparation for a flight to its conclusion, and includes dealing with emergency situations.

Many of the dispatcher's tasks require familiarity in dealing with specific Government or Air Carrier regulations and procedures. Others require exercising judgment to deal with unique aspects of a situation. Virtually all of these problem solving activities require skill in working with the flight crew, Air Traffic Control and other members of the Air Carrier Operations Control and Maintenance staff.

Appendix A indicates the areas of knowledge necessary to perform these functions. It is important to recognize, however, that the dispatcher must not only be knowledgeable about these areas, but must also be skilled in applying them in order to complete routine tasks, and to detect and deal with potential or actual problems in a timely fashion.

The items listed below indicate the minimum set of topics that must be covered in a training course for aircraft dispatcher certification. The order of coverage is flexible and at the discretion of the approved school. Prior to exercising the privileges of an aircraft dispatcher certificate, satisfactory completion of Initial dispatch training (provided by the air carrier) must be accomplished to ensure comprehensive coverage for that air carrier's specific operation, as approved by the Administrator.

In proposing an aircraft dispatcher certification course for approval, a course outline must be submitted that indicates the major topics and subtopics to be covered. Additional subject headings can also be included. The outline must also indicate how the minimum total course hour requirement of 200 hours will be met.

L REGULATIONS

- A. Subpart C of Part 65 of this chapter,
- B. Parts 1, 25, 61, 63, 71, 91, 121, 135, 139, 175, NTSB830 of this chapter,

IL METEOROLOGY

A. Basic Weather Studies

- The Earth's motion and its effect on weather
- Analysis of regional weather types, characteristics and structure:
 - a) Maritime
 - b) Continental
 - c) Polar
 - d) Tropical
 - e) Combination thereof
- Analysis of local weather types, characteristics and structure of:
 - a) Coastal
 - b) Mountainous
 - c) Island
 - d) Plains
 - e) Combination thereof
- The Atmosphere
 - a) Layers
 - b) Composition
 - c) Global Wind Patterns
 - d) Ozone

- b) Weather Systems Characteristics
- c) Temperature Effects on Pressure
- d) Altimeters
- e) Pressure Gradient Force
- f) Pressure Pattern Flying Weather
- 6) Wind
 - a) Major Wind Systems and Coriolis Force
 - b) Jetstreams and their Characteristics
 - c) Local Wind and Related Terms
- 7) States of Matter
 - a) Solid, Liquid, and Gases
 - b) Causes of change of state
- 8) Clouds
 - a) Composition, Formation, and Dissipation
 - b) Types and Associated Precipitation
 - c) Use of Cloud Knowledge in Forecasting
- 9) Fog
 - a) Causes, Formation and Dissipation
 - b) Types
- 10) (ce
 - a) Causes, Formation and Dissipation
 - b) Types
- 11) Stability / Instability
 - a) Temperature Lapse Rate, Convection
 - b) Adiabatic Processes
 - c) Lifting Processes
 - d) Divergence
 - e) Convergence
- 12) Turbulence
 - a) jetstream Associated
 - b) Pressure Pattern Recognition
 - c) Low Level Wind Shear
 - d) Mountain Waves
 - e) Thunderstorms
 - f) Clear Air Turbulence
- 13) Airmasses
 - a) Classification and Characteristics
 - b) Source Regions
 - c) Use of Airmass Knowledge in Forecasting
- 14) Fronts
 - a) Structure and Characteristics/Vertical and Horizontal
 - b) Frontal Types
 - c) Frontal Weather Flying
- Theory of Storm Systems
 - a) Thunderstorms
 - v) Tamadoes
 - c) Hurricanes/Typhcons
 - d) Microbursts
 - e) Causes, Formation, and Dissipation

- Observations a) Surface Observations Observations made by certified weather observer Automated Weather Observations b) Terminal Forecasts c) Significant En route Reports and Forecasts
 - Pilat Reports
 - ii Area Forecasts
 - Sigmets, Airmets
 - Center Weather Advisories
 - d) Weather Imagery
 - Surface Analysis
 - 11 Weather Depiction
 - iii Significant Weather Prognosis
 - iv Winds and Temperature Aloft
 - v Tropopause Chart
 - vi Composite Moisture Stability Chart
 - vii Surface Weather Prognostic Chart
 - viii Radar Meteorology
 - Satellite Meteorology
 - Other charts as applicable
 - e) Meteorological Information Data Collection Systems
- 21 Data Collection, Analysis and Forecast Facilities
- 31 Service Outlets Providing Aviation Weather Products
- C. Weather Related Aircraft Hazards
 - 1) Crosswinds/Gusts
 - Contaminated Runways
 - 3) Restrictions to Surface Visibility4) Turbulence/Windshear

 - 5) <u>icing</u>
 - Thunderstorms/Microburst
 - 7) Volcanic Ash

III NAVIGATION

- A. Study the Earth as a planet.
 - Time reference and location (0 Longitude, UTC, etc.)
 - 2) Definitions
 - 3) Projections
 - Charts
- B. Chart reading application and use
- C. National Airspace Plan
- D. Navigation Systems
- E. Airborne Navigation Instruments
- F. Instrument Approach Procedures
 - 1) Transition Procedures
 - 2! Precision Approach Procedures
 - 3) Non-precision Approach Procedures
 - Minimums and the relationship to weather
- G. Special Navigation and Operations
 - 1) North Atlantic
 - 2) Pacific
 - 3) Global Differences

- · A. Performance
 - 1) Aircraft in general
 - 2) Principles of flight
 - a) Group one aircraft
 - b) Group two aircrait
 - 3) Aircraft flight manual limitations
 - 4, Weight and Balance
 - 5) Flight instrument errors
 - Aircraft performance
 - a) Take-off performance
 - b) Enrouteperformance
 - c) Landingperformance
 - B. Systems Overview
 - Flight controls
 - 2) Hydraulics
 - Electrical
 - 4) Air Conditioning and Pressurization
 - 5) Ice and Rain protection
 - 6) Avionics
 - 7) Fowerplants and Auxiliary Power Units
 - 8) Emergency and Abnormal Procedures
 - C. Minimum Equipment List/Configuration Deviation List (MEL/CDL) Applications

V. COMMUNICATIONS

- A. Regulatory requirements
- B. Communication Protocol
- C. Voice and Data Communications
- D. Notice to Airmen (NOTAMS)
- E. Aeronautical Publications
- F. AbnormalFrocedures

VI AIR TRAFFIC CONTROL

- A. Kesponsibilities
- B. Facilities and Equipment
- Airspace classification and route structure
- D. Flight Flans
 - 1) Dumestic
 - 2) International
- E. Separason Minimums
- F. Priority Handling
- G. Holding Procedures
- H Traffic Management

VII EMERGENCY AND ABNORMAL PROCEDURES

- Security measures on the ground
- B. Security measures in the air
- C. FAA responsibility and services
- U. Collection and dissemination of information on over due or missing aircraft
- E. Means of declaring an emergency
- F. Responsibility for declaring an emergency
- C Required reporting of an emergency
- NTSB reporting requirements

A. Haman Factors

- Decision Making
 - a) Situation Assessment
 - b) Generation and Evaluation of Alternatives
 - Tradeoffs and Prioritization
 - ii Contingency Planning
 - c) Support Tools and Technologies
- Human Error
 - a) Causes
 - Individual and Organizational Factors
 - 11 Technology-Induced Error
 - b) Prevention
 - c) Detection and Recovery
- 3) Learnwork
 - a) Communication and Information Exchange
 - c) Cooperative and Distributive Problem-Solving
 - c) Resource Management
 - i Air Traffic Control (ATC) Activities and Workload
 - ii Flight Crew Activities and Workload
 - iii Maintenance Activities and Workload
 - iv Operations Control Staff Activities and Workload
- B) Applied Dispatching
 - 1) Briefing techniques, Dispatcher, Pilot
 - 2) Preflight:
 - a) Safety
 - b) Iconomics of Flight Overview (Performance, Fuel Tankering)
 - c) Weather Analysis
 - i Satellite imagery
 - 11 Upper and lower altitude charts
 - iii Significant enroute reports and forecasts
 - N Surface charts
 - Surface observations
 - Terminal forecasts and Orientation to Enhanced Weather Information System (EWINS)
 - d) NOTAMS and airport conditions
 - e) Crew
 - i. Qualifications
 - ii. Limitations
 - f) Aircraft
 - i. Systems
 - Navigation instruments and avionics systems
 - iii. Flight instruments
 - Operations manuals and MEL/CDL
 - v. Performance and limitations
 - g) Flight Planning
 - i. Route of flight
 - Standards Instrument Departures and Standard Terminal Arrival Routes Enroute charts
 - Operational altitude
 - Departure and arrival charts

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Cruise

Decen:

- h) Weight and balance
- i) Decision to operate the flight
- j) AIC flight plan filing
- k) Flight occumentation
 - i. Flight plan
 - ii. Flight release
- 3) Authorize flight departure with concurrence of pilot in command
- 4) In-flight operational control
 - a) Current situational awareness
 - b) Information exchange
 - c) Amend original flight release as required
- 5) Post-Flight
 - a) Arrival verification
 - b) Weather debrief
 - c) Flight irregularity reports as required

For each of these topics, coverage should include state of the art technologies and techniques, as well as provide a foundation for understanding future developments. For updated technological advancements refer to the Fractical Test Standards as published by the FAA.

IX FACILITIES EQUIPMENT AND MATERIAL

An applicant for authority to operate an approved atteraft dispatcher course of study must have adequate facilities, equipment, and materials to provide each student the theoretical and practical aspects of aircraft dispatching.

X INSTRUCTORS

- A. The number of instructors available for conducting the course of study shall be determined according to the needs and facilities of the applicant. However, the ratio of students per instructor may not exceed 25 students for one instructor.
- B. At least one instructor who possesses an aircraft dispatcher certificate must be available for coordination of the training course instruction. A certified dispatcher must participate in the instruction of the Practical Dispatch Applications section.

XI REVISION OF THE TRAINING COURSE

Requests for revision of the course outlines, facilities, and equipment shall be accomplished in the same manner established for securing approval of the original course of study. Revisions must be submitted in such form that an entire page or pages of the approved outline can be removed and replaced by the revision.

The list of instructors may be revised at any time without request for approval, provided the minimum requirements are maintained and the local inspector is notified in writing.

XII CREDIT FOR PREVIOUS EXPERIENCE OR TRAINING

A course operator may evaluate an entrant's previous experience or training and where the training or experience is provable and imparable to portions of the approved course curriculum, may, as each individual case warrants, a low credit for such, commensurate with accepted training practice. Where credit is allowed, the base of allowance and the total hours credited must be incorporated as a part of the students records, provided for in paragraph (XIX) of this Appendix.

Approval of a course may that be communed in effect unless the course operator keeps an accurate record of each student, including ohn hological log of all instructors, subjects covered, and course examinations and grades, for a period of not it is than three years. The course operator must also prepare, retain and transmit to the FAA not liver than January 31 of each year, a report containing the following information:

- 1. The names of all sudents graduated, together with school grades for attorast dispatcher courses.
- 2. The name of all this incidents failed or withdrawn, together with school grades and reasons for withdrawal.

XIV QUALITY OF INSTRUCTION

Approval of a course may not be continued in effect unless at least 80% of the students who apply within 90 days after graduation are able to qualify on the first attempt for certification as aircraft dispatchers. During the mutial start up period the Training Center Program Manager has the authority to waive the 80% pass requirement for not more than three graduating classes.

XV STATEMENT OF GRADUATION

Each student who successfully completes the approved aircraft dispatcher course shall be given a statement of graduation.

XVI CHANGE OF OWNERSHIP NAME OR LOCATION -

When an approved course changes ownership, name, or location, the Administrator must be notified of the change in writing within 93 days. The Administrator's representative will audit the course for compliance with Part 65 and issue a letter of approval reflecting the changes.

XVII CANCELLATION OF APPROVAL

- A. Failure to meet or maintain any of the standards set forth in Part 65 for the approval or operation of an approval aircraft dispatcher course is considered to be a sufficient reason for discontinuing approval of the course.
- B. If an operator desires columnary cancellation of his approved course, he shall send a letter requesting cancellation to the Administrator of the Federal Aviation Administration through the Training Center Program Manager. The operator will be responsible for forwarding any records as requested by the Administrator.

XVIII DURATION

The authority to operate an approved aircraft dispatcher course of study expires 24 months after the last day of the month of assuance.

XIX RENEWAL

Application for renewal of an approved aircraft dispatcher course shall be made by letter addressed to the Administrator of the Federal Aviation Administration through the local inspector at any time within 30 days of the expiration date. Renewal of approval will depend on the course operator's meeting the current conditions of course approval and having a satisfactory record as a course operation.

Memorandum

To: Training and Qualifications Issues Group of the

Aviation Rulemaking Advisory Committee (ARAC)

From: Association of Flight Attendants, Committee Member

Subject: Flight Attendant English Language Standards

Date: June 1, 1995

Background. On April 18, 1994, The Federal Aviation Administration (FAA) published an Advance Notice of Proposed Rulemaking (ANPRM) regarding an Operator Flight Attendant English Language Program. The issue was later placed on the December 7, 1994 agenda of the Training and Qualifications Committee of the Aviation Rulemaking Advisory Committee (ARAC). At that meeting, concern was expressed that the comments received by the FAA did not appear to contain data of sufficient specificity for the FAA to proceed with rulemaking. Meg Leith, Association of Flight Attendants, requested an extension, until the next Committee meeting, for members of the Issues Group to collect such data from their constituents.

Summary of Conclusions. In response to the Committee's interest in additional data, we are providing the following information.

1-Aviation deregulation and globalization have altered both the aviation workforce and the names of the carriers flying internationally. Previously, work for US carriers was done primarily by US citizens. For example, TWA concluded in the 1970s that they would be better served by hiring language-qualified individuals in the US than having foreign national flight attendants based abroad.

Now, however, four US carriers -- American, Northwest, Tower and United -- employ a total of approximately 1500 flight attendants who were hired abroad and are domiciled abroad. (See attachment A.) Unless they live in an English-speaking country, they have limited opportunities and few requirements to speak English, except on the airplane. Because carriers believe hiring abroad is beneficial for cultural and economic reasons, it is likely to grow. For safety reasons, commercial pilot hiring is done in the US; there is no indication this trend will change.

2-We have collected some reports of inadequate English and inadequate knowledge of cabin safety concerning these relatively recently hired flight attendants. (See Attachment B.) One reason there are few reports is that the problem, itself, is limited at this time. A second important reason is the absence of a standardized procedure for reporting such problems, since there is no Federal Aviation Regulation (FAR) requiring English language-qualified flight attendants. A third reason is that many flight attendants who were hired abroad fly together as a crew, without any native English speakers in the cabin to observe their English

language abilities. Finally, individuals are reluctant to "report on" their fellow workers, especially when the result could be discipline rather than an opportunity for assistance.

While the number of reports is limited, the implications for safety in many of them are extremely serious.

3-The appropriate standard for flight attendants is a modification of the existing standard for pilots in Section 61.151 of the FARs. Under such a standard, the flight attendant should be able to read, write and understand the English language and speak it without accent or impediment of speech that would interfere with [two-way radio conversation] effective inflight communications (between the cockpit and cabin crew, among cabin crew and between cabin crew and passengers). (The words in brackets from the pilots' rule would be deleted in favor of the underlined words.)

4-There would be no new English language training costs to US carriers under this standard. While carriers may facilitate training in a second language, by providing tapes or other material in a crew lounge, they generally do not pay for training in a second language. Where reports of insufficient English language are verified, they could choose to provide English language tapes in crew lounges located abroad. Alternatively, libraries in large metropolitan areas, the points of arrival and departure for international flights, probably have language tapes and other language aids. Local schools and tutors are other options for these individuals.

5-There would be no new flight attendant training costs if an individual is found to have insufficient English language skills to perform safety-sensitive functions. Trans-oceanic and transhemispheric flights are traditionally operated with a number of flight attendants in excess of the FAA minimums. (See Attachment C.) Individuals who do not possess sufficient English language skills could work as translators on flights where they previously worked as flight attendants. This could be a temporary or permanent arrangement, depending on the extent to which the individual is determined to improve his or her English. Carriers will, however, need to adopt somewhat more sophisticated hiring practices to ensure that the individuals they hire are competent to function in a safety-sensitive position in English.

6-On December 13, 1994, the FAA issued a Notice of Proposed Rulemaking (NPRM) mandating Crew Resource Management (CRM) for pilots, flight attendants and dispatchers. One element of the program is recurrent practice and feedback. Sufficient English language skills to function in emergency situations will be essential under this program. Thus it is in the interests of the carriers and the affected flight attendants to have a standard at this time, which will allow them to resolve English language problems which would inhibit effective communication between the cabin and the cockpit, before the new rules take effect.

- o Flight Attendant Report. During recurrent training, a US-born flight attendant was teamed with two French flight attendants in an exercise involving reading a series of multiple choice questions and reaching a consensus within a set period of time. One Frenchborn flight attendant needed to have the other Frenchborn flight attendant translate every question. The three could not have completed the assignment if time was taken for translation. So the two who could read English handled the assignment.
- o Flight Attendant Report. During an initial training class in the US, trainers from a Spanish-speaking city were brought in to help train of flight attendant trainees from the same city.
- o Flight Attendant Report. Following a 1989 incident when the cockpit filled with smoke, passengers complained they could not understand the commands of the lead flight attendant who had a heavy Greek accent.
- o Flight Attendant Report. A flight attendant, whose first language is Spanish, was elevated to the lead position where he was required to make the PA announcements. Passengers sometimes needed to ask US-born flight attendants for clarification about the announcement. Flight attendants, talking among themselves, noted that they could understand him in face to face conversation but that they, too, had difficulty understanding him over the PA.
- o Flight Attendant Report. During a work trip with foreign national trainees, the US-born flight attendants noticed that the foreign national trainees would not carry out the safety demonstration without looking at the other flight attendants.
- o Flight Attendant Report. Passengers complained about not being able to understand the safety announcement done by a flight attendant with a heavy French accent.
- o Flight Attendant Report. Passengers commented about their difficulty in understanding the safety announcement given by the lead flight attendant with a heavy Asian accent and their confusion about the location of their lifevests.
- o Flight Attendant Report. Going through recurrent training with a Japanese national, the US-born flight attendant could not understand the Japanese flight attendant even when she knew exactly what the Japanese-born flight attendant was saying. For example, she knew the Japanese-born flight attendant was saying "Grab your ankles, grab your ankles" because that was what was appropriate in the scenario. However, she could not understand a single word.
- o Flight Attendant Report. An Italian-born flight attendant is not considered to very smart by many of his fellow flight attendants who are US-born. However, another flight attendant who observed him closely believes it is an English language problem, that he is not sufficiently comfortable to "think" in English but rather must translate from Italian to English and back to Italian.

FLIGHT ATTENDANTS EMPLOYED BY U.S. AIRLINES BASED IN FOREIGN DOMICILES, MARCH 1995

Airline/Union	Flight Attendants Represented by the Union (On The Seniority List), And Dates Bases Were Established	Flight Attendants Not Represented By The Union (Off The Seniority List), And Dates Bases Were Established
American/ APFA	None	783 in South American cities, including Bogota, Lima, Buenos Aires.
		Began in 1990 with purchase of Eastern's South American routes.
Northwest/ IBT	None	67 Tokyo 121 Taipei 71 Singapore 37 Soeul 76 Hong Kong 85 Bangkok 25 Manila
		Far East routes began in 1947.
Tower/ AFA	None	100 Tel Aviv, 1989 40 Bombay, 1994 40 Delhi, 1994 180 Total
United/ AFA	London, 1991 250 Americans 500 local hires Paris, 1992 55 Americans (maximum 75 visas available) 250 local hires Taipei, 1993 50 Americans 180 local hires 1,285 Total	56 Bankok, 1986 199 Singapore, 1986 255 Total Hong Kong proposed 1994; on hold.
GRAND TOTAL 2,985	355 Americans } 930 local hires } 1,285 TOTAL	1,700 TOTAL

AFA Research Department 3/95

English Language/Cabin Safety Problems

Reports from Crew at Major Carriers

o Pilot Report. A pilot introduced himself to the non-US born cabin crew prior to the beginning of the flight and chatted briefly with them. He asked one group if the overwing exits had a raft and another individual if the upper deck exit had a raft. The flight attendants responded in the affirmative both times. (These exits have slides, not rafts.) Later one of these flight attendants entered the cockpit to ask if the pilots would like lunch. The pilot responded, "ya, nachos and cheese". The flight attendant said OK and turned to exit. The pilots called her back to explain the joke.

The pilot later expressed his concerns about potential safety problems to the carrier's senior management official in charge of cabin safety. This individual acknowledged that additional English language training was necessary and that these newly hired non-US flight attendants had a limited understanding of cabin safety.

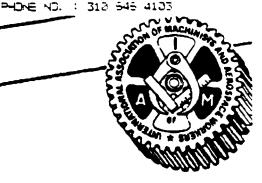
- o Machinist Report. LAXIAM Assistant General Chairman spoke to carrier's CEO and wrote to the Vice-President of Inflight Services about passengers having difficulty understanding the pre-flight announcement. (Letter is attached to this document.)
- o Flight Attendant Report. During an evacuation, a Chinese-born male flight attendant disarmed the door before opening it. The US-born flight attendant seated near him shouted "close the door" repeatedly but he did not understand and did not do it. As a result, the door was not usable for the evacuation. In normal circumstances, this flight attendant can communicate in English. The US flight attendant who witnessed what happened reported it to the company. The union recommended one day of supplemental safety training with no discipline. The company agreed to the request.
- o Flight Attendant Report. On a Pacific flight, the US-born lead flight attendant asked the pilot to go around again because the cabin had not been properly prepared for landing. The remaining cabin crew, who were not US-born, were not aware of what steps needed to be taken.
- o Flight Attendant Report. A pilot announced "flight attendants, prepare for landing." This command is given while the plane is in the air. It is the signal for flight attendants to check that seat belts are fastened, to ensure tray tables are stored, to make sure seat backs are in the upright position, to see that carry-on baggage is stowed and to visually check the cabin. The non-US born flight attendants responded to the command by disarming their doors, which would have prevented use of these doors in any emergency that occurred before landing. This event was reported to the carrier's training department, which indicated it would provide specialized sensitivity training.

He bids positions that require limited language communication in non-emergency situations.

- o Flight Attendant Report. US flight attendants have commented that foreign-born flight attendants who have difficulty speaking English often refer passengers to flight attendants who can converse in English.
- o Flight Attendant Report. Flight attendants who normally fly trans-Pacific routes were flying as extras on a domestic route. They had copies of flight attendant reports for the company with them. They talked about the fact that these reports were complaints about the inferior English-language capabilities of recently hired non-US born flight attendants.
- o Flight Attendant Report. One US carrier originally required US-born flight attendants to achieve a Berlitz Level III or IV to become qualified in a foreign language but did not require non-US born flight attendants to pass a qualification test in their second language (English). After problems developed, a requirement was set for Level IV English language competency when English was the second language. The standard was not applied retroactively.
- o Passenger Report. A passenger sent a letter to a major US carrier complaining that when she became sick on an international flight, she couldn't communicate her problem to the non-US born flight attendants. Another passenger had to intervene. The woman was frustrated because she did not expect this type of problem on a US carrier.
- o Passenger Report. A businessman, flying from the US to Europe, wrote to a major US carrier that if he had wanted French to be the language spoken in the cabin he would have flown Air France.
- o Passenger Report. A labor union leader, talking with a flight attendant, indicated he had just flown in from Europe on the carrier for which she flies. She asked if he could understand the flight attendants. He responded "barely".
- o Passenger Report. A passenger on a trans-pacific flight requested a scotch and was brought a bourbon. When the passenger asked for the mistake to be corrected, the passenger was brought a bourbon again. When she requesting a correction for the second time, she was brought a bourbon yet again.
- o Passenger Report. A passenger seated in the smoking section of a trans-Pacific flight noticed that the flight attendants and most of the passengers in the back of the plane were not US-born. She attempted to communicate with the two flight attendants in her area and realized they could not understand anything she was saying. She became concerned about what would happen if an emergency were to occur. She had the same experience on the return flight. She reported her concern to a friend who worked for a union representing flight attendants.

FROM : AFA COUNCIL 12

DISTRICT LODGE 141
MACHINISTS UNION



5/19/95

Home Office P. C. Box 3141 So. San Francisco, CA 94083-3141 (415) 873-0662

WHQSW - Sara Fields Vice-President Inflight Services

Dear Sara:

At yesterday's Annual Sharholder Meeting I spoke to Mr. Greenwald regarding what I perceived to be a problem in the way that the required pre-flight safety announcement was communicated to the passengers on the Seattle - San Francisco segment of flight 2035 on the 10th of May. He suggested that I communicate with you.

The first flight attendant began making the announcement as soon as we started the pushback. I immediately noticed that she had trouble with the English language. She was of Oriental background and it was quite evident in the way she attempted to read and proncunce the text of the announcement. She struggled through it. The reaction of the passengers was disturbing to me in that you could easily tell that they were having a hard time understanding her. I felt like asking one of the other flight attendants to take over the announcement! In a word the situation was uncomfortable.

As I listened to the complaints from the AFA regarding the foreign domiciles and the company's responses to them, I can only hope that the company puts the same emphasis on the language skills of an international flight attendant working on a domestic segment.

Sincerely,

Joe Flocca

Assistant General Chairman

twaca

LAXIAM

cc: LAXSW - Charlie Costello

12109 Hawthome Boulevard • Hawthome, California 90250 • (310) 844-5107

Flight Attendant Staffing on International Flights FAA Minimums compared to Actual Staffing

Carrier	# Seats	FAA Minimum F/As	Average # F/As
<u> AA</u>			
F100	98	2	2
Super 80	139	3	3/4
727-200	142	3	3/4
767-200/300	211	5	8-11
757	188	4	4/5
A300	267	6	7
DC-10	256	6	8-11
MD-11	245	6	10
CO-internation	al only		
B-747	392	9	15
DC-10	280	6	10
NWA-internation	nal only		
DC-10	288	6	6-9
DC-10	267	6	6-9
DC-10	279	6	6-9
747-100	454	10	10-13
747-200	370	8/9	10-13
747-200	358	8/9	10-13
747-200	360	8/9	10-13
747-400	383	9	10-14
TWA			
DC9-15 (8069)	73	2	3
DC9-15	68	2	3
DC9-31	90	2	3
DC9-33	90	2	3
DC9-34	90	2	3 3 3 3 3
DC9-41	97	2	3
DC9-51	107	2 2 2 3 3	3
MD82	132		3/4
MD83	134	3	3/4
767-200	171	4	7D/8I
767-200(16050)	179	4	7D/8I
767-200 (16051)	182	4	7D/8I
767-300	204	5	7D/8I
767-300(16103)	226	5	7D/8I
L1011-1	256	6	9D/8I
L1011-50/100	252	6	9D/8I
747-100	429	9	12D/13I
747-200	431	9	12D/13I

<u>UAL</u>			
747-400	418	9	13-19
747-200-YI	293	8	9-17
747-200YR	369	8	9-17
747-100YY	393	8	9-18
DC10-10	287	6	7-10
DC10-10H	287	6	7-10
DC10-30T	298	6	7-10
B767-200	168	4	5-7
B767-200 ETOPS	168	4	5-7
B767-300	211	5	6-11
A-300*	144	3	4
B757-200*	188	4	6
B757-200X	188	4	6
B727-200	147	3	4-5
B737-200*	109	3	4
B737-500	108	3	4
B737-300A*	126	3	4
B737-300B	126	3	4

^{*} indicates plane used for domestic routes, not international

Additional Information Concerning TWA. Where staffing is different on domestic and international flights, D represents domestic staffing and I represents international staffing levels.

Additional Information Concerning NWA. The FAA minimums on the 747-200s vary depending on whether there are any passengers in the upper deck. On the 747-400, it was certified at 9 flight attendants even though the number of seats would suggest certification at 8.

Aviation Rulemaking Advisory Committee Meeting on Training and Qualifications

AGENCY: Federal Aviation Administration (FAA), DOT. ACTION: Notice of meeting.

SUMMARY: The FAA is issuing this notice to advise the public of a meeting of the Federal Aviation Administration Aviation Rulemaking Advisory Committee to discuss training and qualifications issues.

DATES: The meeting will be held on June 1, 1995 at noon.

ADDRESSES: The meeting will be held at the FAA Headquarters building, Room 302, 800 Independence Avenue SW., Washington, DC 20591.

FOR FURTHER INFORMATION CONTACT:

Ms. Judi Citrenbaum, Office of Rulemaking, (ARM-100) 800 Independence Avenue SW., Washington, DC 20591. Telephone: (202) 267-9689.

SUPPLEMENTARY INFORMATION: Pursuant to section 10(a)(2) of the Federal Advisory Committee Act (Pub. L. 92-463; 5 U.S.C. App. II), notice is hereby given of a meeting of the Aviation Rulemaking Advisory Committee (ARAC) to discuss training and qualifications issues. This meeting will be held on June 1, 1995, at noon, in Room 302 of the FAA Headquarters building in Washington, DC. The agenda for this meeting will include a progress report from the Aircraft Dispatcher Working Group. In addition, ARAC will report on its task to evaluate and recommend a course of action regarding comments received on the Operator Flight Attendant English Language Advance Notice of Proposed Rulemaking, published in the Federal Register on April 18, 1994 (59 FR 18456).

Attendance is open to the interested public but may be limited to the space available. The public must make arrangements in advance to present oral statements at the meeting or may present statements to the committee at any time. In addition, sign and oral interpretation can be made available at the meeting, as well as an assistive listening device, if requested 10 calendar days before the meeting. Arrangements may be made by contracting the person listed under the heading FOR FURTHER INFORMATION CONTACT.

Issued in Washington, DC, on May 15, 1995.

Thomas Toula,

Assistant Executive Director for Training and Qualifications, Aviation Rulemaking Advisory Committee.

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BILLING CODE 4910–13–M

